FTC Enforcement Policy: Labels for Fur Products Previously Covered by the FTC's *De Minimis* Exemption

In December 2010, Congress passed the Truth in Fur Labeling Act (TFLA), which eliminates the Commission's exemption authority under the Fur Products Labeling Act (Fur Act), effective March 18, 2011. Under that soon-to-expire authority, the Commission exempted products containing fur or fur trim with a component value of \$150 or less from fur-content labeling (*de minimis* exemption).¹ After March 18, 2011, fur products previously covered by the *de minimis* exemption will be subject to the Fur Act's disclosure requirements, even though the exemption will remain in the Commission's regulations pending rulemaking pursuant to TFLA.

Since TFLA's passage, industry members have expressed concern that compliance with the March 18 deadline will cause sig

¹16 C.F.R. § 301.39(a).

²16 C.F.R. § 301.0.